

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

ALYSSON MILLS, IN HER CAPACITY
AS RECEIVER FOR ARTHUR LAMAR
ADAMS AND MADISON TIMBER
PROPERTIES, LLC,

Plaintiff,

v.

THE UPS STORE, INC.; HERRING
VENTURES, LLC d/b/a THE UPS STORE;
AUSTIN ELSER; TAMMIE ELSER;
COURTNEY HERRING; DIANE LOFTON;
CHANDLER WESTOVER; RAWLINGS &
MACINNIS, PA; TAMMY VINSON; and
JEANNIE CHISHOLM,

Defendants.

Case No. 3:19-cv-364-CWR-FKB

Arising out of Case No. 3:18-cv-252,
Securities and Exchange Commission v.
Arthur Lamar Adams and Madison
Timber Properties, LLC

Hon. Carlton W. Reeves, District Judge

UNOPPOSED MOTION FOR EXTENSION OF TIME

COMES NOW Defendant, The UPS Store, Inc., (“Defendant”), by and through its counsel of record, and respectfully submits this *Unopposed Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff’s Amended Complaint*. In support of its Motion, Defendant would show unto the Court as follows:

1. Plaintiff filed her Amended Complaint on or about June 13, 2019. *See* Docket Entry No. 14.
2. Defendant was served with Plaintiff’s Amended Complaint on or about July 9, 2019. *See* Docket Entry No. 20.
3. Accordingly, Defendant’s answer or other responsive pleading to Plaintiff’s Amended Complaint is due on or about July 30, 2019.

4. In order to adequately respond to the allegations set forth in Plaintiff's Amended Complaint, Defendant respectfully requests a thirty (30) day extension of time, up to and including, August 29, 2019 to answer or otherwise respond to Plaintiff's Amended Complaint.

5. This Motion is not being made for purposes of delay but, is needed to allow Defendant adequate time to fully investigate the allegations of the Amended Complaint and prepare its answer or other responsive pleading to the same.

6. Plaintiff's counsel has been contacted regarding the instant Motion and has no objection thereto.

7. Given the nature of this Motion, Defendant requests that the Court waive the requirement of a separate memorandum.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests a thirty (30) day extension of time, up to and including, August 29, 2019 to answer or otherwise respond to Plaintiff's Amended Complaint.

Dated: July 18, 2019.

Respectfully submitted,

PHELPS DUNBAR, LLP

BY: /s/ LaToya C. Merritt

Reuben V. Anderson, MSB #1587
LaToya C. Merritt, MSB #100054
Jessica Terrill Pulliam, MSB #105510
4270 I-55 North
Jackson, Mississippi 39211-6391
Post Office Box 16114
Jackson, Mississippi 39236-6114
Telephone: 601-352-2300
Telecopier: 601-360-9777
Email: anderson@phelps.com
merrittl@phelps.com

pulliamj@phelps.com

***ATTORNEYS FOR DEFENDANT
THE UPS STORE, INC.***

CERTIFICATE OF SERVICE

I, LATOYA C. MERRITT, do hereby certify that I electronically filed the above and foregoing *MOTION* with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following counsel of record:

Alysson Leigh Mills
Kristen D. Amond
Brent B. Barriere
Jason W. Burge
Rebekka C. Veith
FISHMAN HAYGOOD, LLP
201 St. Charles Avenue, Suite 4600
New Orleans, LA 70170-4600
(504) 586-5294
(504) 586-5250 (fax)
amills@fishmanhaygood.com
kamond@fishmanhaygood.com
bbarriere@fishmanhaygood.com
jburge@fishmanhaygood.com
rveith@fishmanhaygood.com

Lilli Evans Bass
Brown Bass & Jeter, PLLC
P.O. Box 22969
Jackson, MS 39225
(601) 487-8448
(601) 510-9934 (fax)
bass@bbjlawyers.com

ATTORNEYS FOR PLAINTIFF

G. Todd Burwell
Emily Kincses Lindsay
G. TODD BURWELL, PA
618 Crescent Blvd., Ste. 200
Ridgeland, MS 39157
(601) 427-4470
(601) 427-0189 (fax)
tburwell@gtbpa.com
elindsay@gtbpa.com

ATTORNEYS FOR RAWLINGS &

***MACINNIS, PA, JEANNIE CHISOLM,
AND TAMMY VINSON***

William Lee Guice, III
RUSHING & GUICE, PLLC – Biloxi
P.O. Box 1925
Biloxi, MS 39533-1925
1000 Government St., Suite E
Ocean Springs, MS 39564
(228) 374-2313
(228) 875-5987
bguice@rushingguice.com

***ATTORNEY FOR HERRING
VENTURES, LLC, AUSTIN ELSER,
CHANDLER WESTOVER, COURTNEY
HERRING, DIANE LOFTON, AND
TAMMIE ELSER***

THIS, the 18th day of July, 2019.

/s/ LaToya C. Merritt

LATOYA C. MERRITT